

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules with)	GN Docket No. 12-354
Regard to Commercial Operations in the)	
3550 – 3650 MHz Band)	
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To the Commission:

**Additional Comment of Nickolaus E. Leggett, N3NL
Amateur Radio Operator, Inventor, and Analyst**

This additional comment is to clarify that my comments submitted and posted on December 21, 2012 are directed at operations conducted within the General Authorized Access (GAA) licensing tier of the Citizens Broadband Service.

In addition, the rules established for the GAA tier should allow for the introduction of new protocols that will allow more effective use of microwave mobile and portable stations. One such protocol is the Lighthouse Protocol that I developed and published. Reference One.

The Commission should also consider granting Priority Access to users who operate networks that are highly resistant to damaging situations such as solar geomagnetic storms, electromagnetic pulse (EMP) attacks, terrorist physical attacks, or cyber warfare attacks. The social values of such resistant networks justify grants of Priority Access tier licensing.

Respectfully submitted,

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December 26, 2012

Reference One:

**“A ‘Lighthouse’ Protocol for Random Microwave Contacts”, Nickolaus E. Leggett, N3NL,
QEX The Experimenter’s Exchange – Technical Notes July/August 2004 – American
Radio Relay League, Newington, CT.**